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**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

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**APPLICATION OF SOUTHWESTERN
ELECTRIC POWER COMPANY FOR
AUTHORITY TO CHANGE RATES**

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PUBLIC UTILITY COMMISSION

OF TEXAS

PUBLIC UTILITY COMMISSION
FILING CLERK

**COMMISSION STAFF'S TENTH REQUEST FOR INFORMATION
TO SOUTHWESTERN ELECTRIC POWER COMPANY
QUESTION NOS. STAFF 10-1 THROUGH STAFF 10-8**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that Southwestern Electric Power Company (SWEPCO) and through its attorneys of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission's website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Order Suspending Rules in Docket No. 50664.

Dated: January 29, 2021

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Rachelle Nicolette Robles
Division Director

Eleanor D'Ambrosio
Managing Attorney

/s/ Robert Dakota Parish
Rashmin J. Asher
State Bar No. 24092058
Robert Dakota Parish
State Bar No. 24116875
Alaina Zermeno
State Bar No. 24098656
Justin C. Adkins
State Bar No. 24101070
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326
(512) 936-7216
(512) 936-7268 (facsimile)
Rashmin.Asher@puc.texas.gov

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CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on January 29, 2021, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Robert Dakota Parish
Robert Dakota Parish

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DEFINITIONS

- 1) "SWEPCO" or "Company" or "you" refers to Southwestern Electric Power Company. and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- 2) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist, and these documents will be provided.
- 3) "August 18, 2019 outage event" refers to the outages that occurred on SWEPCO's system in eastern Texas and western Louisiana between 15:00 on August 18, 2019 and 00:00 on August 20, 2019 that were reported to the Commission as the Pirkey Area Load Shed Event. "August 18, 2019 outage event" also includes all efforts required to restore power to all of SWEPCO's retail and wholesale customers even if those efforts occurred after 00:00 on 8/20/2019.

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INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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- Staff 10-1** Please state how SWEPCO defines the term “replacement unit.”
- Staff 10-2** What is SWEPCO’s capital replacement policy?
- Staff 10-3** What types of failures are captured/listed in the capital blanket for transmission and distribution?
- Staff 10-4** Provide specific examples for when an equipment failure that has “failed on multiple occasions” is considered in the capital blanket program.
- Staff 10-5** Please identify all capital expenditures that were a result of the outages that occurred during the August 19, 2019 outage event on SWEPCO’s system.
- Staff 10-6** Please identify all operations and maintenance expenses that occurred as a result of, or to restore power after, the August 18, 2019 outage event on SWEPCO’s system.
- Staff 10-7** Please identify all vegetation management expenses that resulted from work identified during the August 18, 2019 outage event.
- Staff 10-8** Knox Lee Outage – Quantify which expenses occurred as a result of the substation fire and explain whether this event was:
- a. Separate from the August 18, 2019 outage event;
 - b. During the August 18, 2019 outage event;
 - c. As a result of the August 18, 2019 outage event; and/or
 - d. Immediately after the August 18, 2019 outage event.